



NSPK
NATIONAL
PAYMENT
CARD
SYSTEM



NSPK JSC Policy of Personal Data Processing and Protection

V.173

Version 1.6

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In the event of any discrepancies between the English version and the Russian original, the Russian original shall prevail. The recipient is solely responsible for the use of the information contained herein.

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Revision List

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Version	Revision Date	Revision Content
1.0	20.02.2018	Initial version.
1.1	15.06.2018	Refining amendments were made to the list of personal data subjects, personal data processing objectives, data processing conditions using NSPK JSC Web resources.
1.2	24.10.2018	Refining amendments were made to the data processing conditions using NSPK JSC Web resources and mobile applications, to the provision of personal data security and confidentiality, to rights and obligations of NSPK JSC and personal data subjects, to terms and definitions.
1.3	28.02.2019	Amendments were made to terms and definitions, the list of personal data subjects was supplemented, the name of the Loyalty program rules for Mir Cardholders was corrected throughout the text, objectives and principles of personal data processing were supplemented, refining amendments were made to the data processing conditions using NSPK JSC Web resources and mobile applications, contacts for feedback were revised.
1.4	24.07.2019	Amendments were made to the procedure for submitting requests by a personal data subject and final provisions of this Policy, refining amendments were made to the data processing conditions using NSPK JSC Web resources and mobile applications.
1.5	02.10.2019	Refining amendments were made to the data processing conditions using NSPK JSC Web resources and mobile applications.
1.6	03.04.2020	The definition of <i>Subscribers</i> was added, the list of personal data subjects was supplemented, refining amendments were made to the data processing conditions using NSPK JSC Web resources and mobile applications.

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1. General Provisions

This NSPK JSC Policy of Personal Data Processing and Protection (hereinafter, the “Policy”) determines the underlying principles, objectives, conditions and methods of personal data processing, lists of subjects and personal data processed by NSPK JSC, functions of NSPK JSC in processing of personal data, rights of personal data subjects, as well as requirements to personal data protection implemented by NSPK JSC.

This Policy was written in compliance with the requirements of the Constitution of the Russian Federation, personal data laws, statutes and regulations of the Russian Federation.

The provisions hereof provide the basis for the drafting of internal policies and procedures governing within NSPK JSC the processing and protection of personal data of NSPK JSC employees and other personal data subjects whose personal data NSPK JSC processes. The provisions hereof are elaborated within the internal NSPK JSC documents.

NSPK JSC ensures the full observance of civil and political rights of personal data subjects when processing their personal data, including protecting their right to privacy, personal and family secrets.

2. Laws and Other Statutes and Regulations

This Policy was written in compliance with the following laws, statutes and regulations of the Russian Federation:

- Federal Law dated July 27, 2006 No. 152-FZ “On Personal Data”;
- The Labour Code of the Russian Federation;
- Decree of the President of the Russian Federation No. 188 dated March 6, 1997 “On the approval of the list of confidential information”;
- Regulation of the Government of the Russian Federation No. 687 dated September 15, 2008 “On approval of the statute on special aspects of personal data processing without the use of automation technology”;
- Regulation of the Government of the Russian Federation No. 1119 dated November 1, 2012 “On approval of the requirements to personal data protection in the course of its processing in personal data information systems”;
- Order of FSTEC of Russia No. 21 dated February 18, 2013 “On approving the list and scope of planning and technical activities for protection of personal data while processing via personal data information systems”;
- The guidelines of the Federal Security Service of the Russian Federation;

- Other statutes and regulations of the Russian Federation and statutory documents of competent public authorities.

3. Terms, Definitions and Abbreviations

The following terms, definitions and abbreviations are used herein:

NSPK JSC – National Payment Card System Joint-Stock Company located at: 11, Bolshaya Tatarskaya Street, Moscow, 115184.

Automated Personal Data Processing – personal data processing by means of computers.

Personal Data Blocking – temporary interruption of personal data processing (except where processing is required for personal data update or alteration).

Cardholders – private individuals who legally use payment cards as electronic payment facilities.

Domain Name – symbol designation for addressing sites on the Internet in order to provide access to information hosted on the Internet.

Applicants – private individuals who sent applications to NSPK JSC.

Customers of Instant Payment System Participants – private individuals who entered into a banking agreement with an Instant Payment System Participant.

Mobile Application – computer software developed by NSPK JSC and designed to run at mobile devices to provide access to NSPK JSC web resources, goods/works/services of NSPK JSC, Mir Payment System Participants, partners (contractors) of NSPK JSC.

Personal Data Depersonalization – actions making it impossible to identify personal data as belonging to a certain data subject without using additional information.

Personal Data Processing – any action or a series of actions with personal data with or without the use of automation facilities, including the personal data acquisition, recording, systematization, accumulation, storage, update and alteration, extraction, use, transfer (distribution, presentation, providing access granting), depersonalization, blocking, deleting and annihilation.

Personal Data Operator (Operator) – state authority, municipal authority, legal entity or private individual, who, independently or jointly, arranges and/or performs personal data processing, as well as defines the objectives of personal data processing, the scope of personal data to be processed and personal data processing operations. In this Policy, NSPK JSC shall be understood to mean the Operator.

Personal Data – any information directly or indirectly related to a specified private individual (data subject).

Subscribers – private individuals who subscribe to newsletters and feedback handling on NSPK JSC Web resources.

Visitors – private individuals who are issued single-use passes to access NSPK JSC premises.

Web Visitors – private individuals who are granted access to external NSPK JSC Web resources using a Web browser and (or) NSPK JSC mobile application.

Regulations on NSPK JSC Operational and Payment Clearing Services – NSPK JSC document establishing the procedure, conditions and provisions of organizing interaction and obtaining operational and payment clearing services of acquisition, processing, and submission of data on transactions with bank cards to credit institutions and the state corporation “Bank for Development (VEB.RF)” when performing funds transfers in the Russian Federation using international payment cards, with the exception of cross-border transfers.

Regulations on NSPK JSC Operational and Payment Clearing Services within the Instant Payment System - NSPK JSC document establishing the procedure, conditions and provisions of organizing interaction and obtaining operational and payment clearing services, including services of acquisition, processing, and submission of data to credit institutions to perform funds transfers using the Instant Payment System (IPS) of the payment system of the Bank of Russia.

Mir Payment System Regulations – set of documents that determines conditions of participation in the Mir Payment System, performance of funds transfers, provision of payment infrastructure services, and other provisions determined by Mir Payment System operator under the laws of the Russian Federation.

Loyalty Program Rules for Mir Cardholders – document(s) that define(s) the conditions of participation in the Loyalty program, and other provisions determined by the operator under the laws of the Russian Federation.

Personal Data Presentation – actions aimed at disclosing personal data to a particular person or a specific group of people.

Personal Data Presentation – actions aimed at disclosing personal data to any number of unspecified persons.

Personal Data Annihilation – actions making it impossible to restore the scope of personal data in the personal data information system and (or) resulting in the elimination of tangible personal data media.

Cookies – set of data stored in the browser settings of a personal data subject and processed by the NSPK JSC Web resource when a personal data subject uses such Web resource.

Web Browser – software used by a personal data subject to view information, including Web resources on the Internet.

Web Resource – NSPK JSC information system that uses data presentation and transmission technologies to provide information services on the Internet.

Other terms and definitions used herein are understood in accordance with the laws of the Russian Federation, Mir Payment System Regulations, Loyalty Program Rules for Mir Cardholders, Regulations on NSPK JSC Operational and Payment Clearing Services, Regulations on NSPK JSC Operational and Payment Clearing Services within the Instant Payment System.

4. The Concept and Scope of Personal Data

NSPK JSC makes a list of personal data processed and subject to protection in accordance with Federal Law dated July 27, 2006 No. 152-FZ “On Personal Data”, other regulations, as well as internal policies and procedures of NSPK JSC with due consideration of personal data processing objectives of personal data subjects specified in the Section 5 hereof.

Information constituting personal data is any information directly or indirectly related to an identified or identifiable individual (personal data subject).

NSPK JSC does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, intimate life.

NSPK JSC processes the personal data of the following subjects:

- job applicants;
- interns;
- employees, including former ones;
- relatives of employees and interns;
- affiliated persons;
- cardholders;
- IPS Participants’ customers;
- NSPK JSC Web resources visitors;
- representatives of contractors, including the contractors of Mir Payment System, IPS;
- visitors, including attendees of events held by NSPK JSC;
- applicants;
- subscribers.

5. Objectives and Principles of Personal Data Processing

NSPK JSC in its capacity of a personal data operator processes personal data for the following purposes:

- provision of intrafacility access control within NSPK JSC;
- staff recruitment (search and review of candidates for vacancies) including receiving and reviewing CVs and other necessary information about the candidate, conducting the necessary checks;
- labor management relations with NSPK JSC employees, including execution, monitoring, amendment, termination of labor contracts, compliance with the relevant requirements of HR legislation of the Russian Federation, compliance with accounting, tax and other requirements, filing applications for medical insurance and bank (payroll) cards, employee training, formalizing holidays, social benefits, record-keeping of tax exemptions and deductions for employees;

- preparation, execution and performance of contracts (agreements) with contractors, including procurement processes, due diligence of potential contractors, implementation of conditions of NSPK JSC service provision for contractors, including:
 - services of creation and revocation of digital signature verification key certificates;
 - provision of information and consulting services through seminars and webinars;
- informational support of NSPK JSC, including preparation, issuance, record keeping and revocation of Powers of Attorney for NSPK JSC employees and external organizations, selection, booking, payment for tickets, hotel stays via specialized agents, receipt and mailing of correspondence, workflow management (preparation, flow management, systematization of internal documents, processing of applications and feedback handling), archival storage, click stream analysis and performance optimization of NSPK JSC sites;
 - fulfillment of conditions of disclosure of mandatory and additional NSPK JSC information, internal and external communication, including press relations used for fair presentation of NSPK JSC operations, processing of personal data of affiliates in order to comply with laws of the Russian Federation;
 - development and management of customer programs, including fulfillment of conditions of participation in the Loyalty program, operation under the Loyalty program rules for Mir Cardholders, marketing activities and promotions, including personal offers, of the Loyalty program, NSPK and Mir Payment System;
 - operating in accordance with Federal Law No. 161-FZ of June 27, 2011 “On the National Payment System”, the Regulations on NSPK JSC Operational and Payment Clearing Services, the Regulations on NSPK JSC Operational and Payment Clearing Services within the Instant Payment System, the Mir Payment System Regulations, including:
 - ensuring reliability, efficiency and availability of funds transfer services;
 - organizational and legal arrangements for accedence to the Regulations, as well as organizational, operational and technical support to Participants and other business partners;
 - handling mail and requests from Participants, other persons and personal data subjects;
 - communication with Participants, other persons, personal data subjects, including sending responses, notifications, decisions, requests and other information related to the implementation of regulations and standards;
 - improving quality of services provided by the Mir Payment System operator, their usability and ease of development of new Mir products and services;
 - resolution of disputes, exceptions and emergencies, including cases of system crashes, process failures, resolution of disputes between Participants, other persons, including disputes related to Transaction performance (non-fulfillment), including cases of fraudulent use of the card arising both between Participants and between parties involved in a Transaction;

- personal data comparison to confirm their accuracy and allow their verification by third parties as provided by applicable law of the Russian Federation;
- prevention of unauthorized transactions, fraudulent transactions and other mis-uses, as well as investigation thereof;
- statistical and other studies, based on anonymised data;
- provision of services to Mir Payment System Participants to organize Secure Cardholder Authentication and make decisions when performing transactions on the Internet, to perform merchant screening.

When processing personal data, NSPK JSC abides by the following principles stipulated by Federal Law dated July 27, 2006 No. 152-FZ “On Personal Data”:

- processing personal data of personal data subjects that are incompatible with the purposes of personal data collection is not allowed;
- processing personal data of personal data subjects that do not comply with the purposes of processing is not allowed. The content and scope of personal data of personal data subjects processed within NSPK JSC meet the declared purpose of their processing;
- when processing personal data of personal data subjects, accuracy, sufficiency and, if necessary, actuality of personal data is ensured;
- personal data of personal data subjects are stored only as long as required for purposes of personal data processing, as well as stipulated by federal laws and agreements where a personal data subject acts as a party, a beneficiary or a guarantor;
- personal data of personal data subjects are processed in accordance with policies and guidelines provided for by laws of the Russian Federation.

6. Personal Data Processing Conditions within NSPK JSC

NSPK JSC processes personal data with the consent from personal data subjects, unless otherwise provided for by laws of the Russian Federation.

NSPK JSC does not disclose to third parties nor does it disseminate personal data without the consent of personal data subjects, unless otherwise provided for by laws of the Russian Federation.

NSPK JSC is entitled to charge another person with the processing of personal data with the consent from the personal data subject under an agreement with such person. Such agreement must contain a list of actions (operations) with personal data that will be performed by the person processing the personal data, as well as purposes of processing, the obligation of such person to keep personal data confidential and ensure personal data security when processing them, as well as requirements to personal data protection under the Article 19 of Federal Law dated July 27, 2006 No. 152-FZ “On Personal Data”.

For purposes of internal informational support, NSPK JSC can create internal reference materials which, with the written consent of the personal data subject, unless otherwise provided for by laws of the Russian Federation, may contain his last name, first name, patronymic, photograph, place of work, position, year and place of birth, address, customer number, email address, other personal data conveyed by the personal data subject.

Only authorized NSPK JSC employees may have access to personal data processed within NSPK JSC.

7. Personal Data Handling Operations and Processing Methods

NSPK JSC collects, records, systematizes, accumulates, stores, refines (updates, alters), extracts, uses, transfers (disseminates, provides, grants access), depersonalizes, blocks, deletes and annihilates personal data.

NSPK JSC uses the following personal data processing methods:

- non-automated personal data processing;
- automated personal data processing with or without transferring the received information via data telecommunications networks;
- mixed personal data processing.

8. Personal Data Processing Conditions

The processing conditions of personal data of personal data subjects within NSPK JSC is set forth in the internal documents of NSPK JSC with due regard for:

- specified personal data processing objectives;
- conditions of contracts to which a personal data subject is a party, a beneficiary or a guarantor, and contracts executed at the initiative of a personal data subject;
- Order of the Ministry of Culture of the Russian Federation dated August 25, 2010 No. 558 “On approval of the “List of standard administrative archive documents generated in the course of activities of government agencies, local government bodies and organizations, with the indication of their storage periods”;
- Resolution of the Federal Commission for the Securities Market No. 03-33/ps dated 16 July 2003 “On procedure and conditions of storage of documents of Joint Stock Companies”;
- statutes of limitations on actions;
- other statutory documents of the Russian Federation.

9. Ensuring Personal Data Security and Confidentiality

NSPK JSC takes the legal, technical and organizational measures provided for by laws of the Russian Federation necessary to ensure security of processed personal data of personal data subjects to protect personal data from unlawful or accidental access, annihilation, alteration, blockage, copying, presentation, dissemination, as well as other illegal actions regarding personal data of personal data subjects.

The security of personal data of personal data subjects is ensured within NSPK JSC under the laws of the Russian Federation and NSPK JSC internal policies and procedures regarding processing and protection of personal data, namely:

- identifying threats to the security of personal data of personal data subjects when processing via personal data information systems of NSPK JSC;
- taking organizational and technical measures to ensure security of personal data of personal data subjects when processing them via personal data information systems of NSPK JSC, necessary to comply with the requirements to personal data security the execution of which ensures the levels of personal data protection established by the Government of the Russian Federation;
- application within NSPK JSC of information security facilities approved by FSTEC and the Federal Security Service of the Russian Federation in cases when applying such facilities is required to neutralize immediate threats to personal data security;
- assessing the effectiveness of measures taken to ensure the security of personal data prior to the commissioning of the personal data information system of NSPK JSC;
- stock-taking of personal data media;
- detecting cases of unauthorized access to personal data of personal data subjects and taking appropriate security measures;
- restoring personal data of personal data subjects modified or deleted due to unauthorized access;
- setting rules of access (including access restriction) to personal data of personal data subjects processed in the personal data information systems of NSPK JSC, as well as ensuring the registration and logging of all actions performed with personal data in the personal data information systems of NSPK JSC;
- assigning NSPK JSC officers responsible for processing and protection of personal data of personal data subjects by orders within NSPK JSC;
- control over measures taken to ensure personal data security and security levels of the personal data information systems of NSPK JSC.

10. Use of NSPK JSC Web Resources and Mobile Applications

NSPK JSC uses cookies which includes processing information about Web Visitors, necessary for correct operation of NSPK JSC Web resources and mobile applications, as well as to improve the operation

quality and usability of NSPK JSC Web resources and mobile applications, personalize services and offers for Web Visitors.

Some of the functionality of NSPK JSC Web resources and mobile applications can be used for personal data presentation. However, to use special features of NSPK JSC Web resources and mobile applications, user data, including personal data, have to be provided.

By checking a box or clicking a button in the electronic acceptance form provided by the NSPK JSC Web resource and (or) mobile application, a personal data subject agrees to processing of his personal data by NSPK JSC under the conditions provided for herein.

A personal data subject does not use the NSPK JSC Web resources and (or) mobile applications, not does he provide his personal data to NSPK JSC unless he agrees with the provisions of this Section of the Policy.

NSPK JSC processes personal data using Web resources and mobile applications under the conditions set forth in Appendix 1 hereto.

11. Rights and Obligations of NSPK JSC and Personal Data Subjects

NSPK JSC, in its capacity of the personal data operator, is entitled to:

- seek legal redress;
- provide third parties with personal data of personal data subjects, as provided for in laws of the Russian Federation (tax authorities, law enforcement bodies etc.);
- deny the presentation of personal data in cases provided for in laws of the Russian Federation;
- use personal data of personal data subjects without their consent in cases provided for in laws of the Russian Federation.

NSPK JSC, in its capacity of the personal data operator, shall:

- provide to a personal data subject, at his request, information provided for in Part 7, Article 14 of Federal Law dated July 27, 2006 No. 152-FZ “On Personal Data”;
- explain to a personal data subject the legal implications of his refusal to provide NSPK JSC with his personal data, provided that the provision of personal data to NSPK JSC by the personal data subject is mandatory under the Federal Law;
- if personal data was not obtained from a personal data subject, except as provided for in Part 4, Article 18 of Federal Law dated July 27, 2006 No. 152-FZ “On Personal Data”, provide the following information to a personal data subject prior to processing such personal data:
 - 1) a designation or a full name and address of the operator or its representative;
 - 2) purposes of personal data processing and its legal grounds;
 - 3) intended users of personal data;
 - 4) rights of a personal data provided for in the Federal Law;

5) source of personal data.

- when collecting personal data of personal data subjects, including via the Internet, ensure recording, systematization, accumulation, storage, refinement (update, alteration), extraction of personal data of personal data subjects using databases located in the Russian Federation, with the exception of cases specified in Clauses 2, 3, 4, 8, Part 1, Article 6 of Federal Law dated July 27, 2006 No. 152-FZ “On Personal Data”.

NSPK JSC takes reasonable measures to maintain accuracy and relevance of the available personal data, as well as to delete personal data of personal data subjects if they are obsolete, inaccurate or redundant or if the purposes of their processing have been achieved.

A personal data subject is entitled to:

- withdraw consent to the processing of personal data;
- require that his personal data be refined, blocked or deleted if such personal data are incomplete, obsolete, inaccurate, obtained illegally or are not necessary for the stated purpose of processing, as well as take measures provided for by law to enforce his rights;
- require a list of his personal data processed within NSPK JSC, and their source;
- receive information on the processing conditions of his personal data, including the storage period;
- require that all persons to whom his incorrect or incomplete personal data were previously conveyed be notified of all exceptions, corrections or additions made to them;
- appeal to an authorized body for defense of rights of personal data subjects or to a court against the actions or inaction in processing of his personal data;
- seek in court the protection of his rights and legal interests, including indemnification and (or) compensation for moral harm.

Personal data subjects are liable for provision of reliable information to NSPK JSC, as well as for the timely update of the data provided in case of changes.

12. Feedback

If a personal data subject wants to know what personal data NSPK JSC holds on him, or to supplement, correct, depersonalize or delete any incomplete, inaccurate or obsolete personal data, or wishes for NSPK JSC to stop processing his personal data, or has other legal claims, he can exercise such right as and when required under the laws of the Russian Federation by contacting NSPK JSC.

In some cases (e.g., if a personal data subject wants to delete his personal data or interrupt their processing), such request may also mean that NSPK JSC will no longer be able to provide services to such personal data subject.

To handle requests of personal data subjects, NSPK JSC may require to establish identity of such personal data subject and request additional information confirming his relations with NSPK JSC, or

information otherwise confirming the fact of personal data processing within NSPK JSC. In addition, the right of a personal data subject to access its personal data may be abridged in accordance with the laws of the Russian Federation on personal data, including if access of a personal data subject to its personal data breaches rights and legitimate interests of third parties.

The procedure for submitting requests by a personal data subject is specified by the requirements of Federal Law dated July 27, 2006 No. 152-FZ “On Personal Data”. Namely, in accordance with the specified requirements, a request must contain:

- series and number of the personal identity document of a personal data subject (his representative), information about the issue date of the specified document and the issuing authority;
- evidence of the personal data subject’s relations with NSPK JSC (contract number, contract date, designation and (or) other information) or information otherwise confirming the fact of personal data processing within NSPK JSC;
- signature of the personal data subject (his representative).

If a request is sent by a representative of the personal data subject, the request must contain a document (copy of the document) confirming the authority of this representative.

A request may be sent by a personal data subject in electronic form. Such requests must be verified by an enhanced digital signature of the personal data subject.

NSPK JSC contacts for personal data subjects’ requests:

mail address: 11, Bolshaya Tatarskaya str., Moscow, 115184; email: info@nspk.ru.

13. Final Provisions

This Policy is the NSPK JSC internal document which becomes effective upon approval and is publicly accessible and subject to publication (distribution) on the NSPK JSC web-resource with the domain name nspk.ru (the Russian version), nspk.com (the English version).

NSPK JSC may amend this Policy. When amending the front page of this document, the latest date of an update of the version hereof is indicated. Amendments made to this Policy become effective upon approval, unless otherwise specified by the very amendments.

The current version hereof is stored as a hard copy at the location of the NSPK JSC executive body at the address: 11, Bolshaya Tatarskaya Street, Moscow, 115184.

NSPK JSC recommends that personal data subjects regularly refer to this Policy to review the last current version.

Appendix 1. Personal Data Processing Conditions Using NSPK JSC Web Resources and Mobile Applications

NSPK JSC processes personal data using Web resources and mobile applications under the following conditions:

Personal data subject	Purpose of personal data processing	Scope of personal data	Domain name	Method of personal data processing	Personal data transfer	Personal data processing operations	Term of consent
Web resources visitors	Ensuring proper operation, click stream analysis and performance optimization of NSPK JSC Web resources and mobile applications, including improvement of operation and usability, personalization of services and offers	<ul style="list-style-type: none"> - IP address - Date and time of the Web resource visit - Browser and operating system types - Type and model of mobile device - Click-through URL - Behavioral information (including the number and names of the pages viewed) - Age, sex, interests, geographical location of the user - Other technical data (cookies, flash, java etc.) 	<ul style="list-style-type: none"> - www.nspk.ru - privetmir.ru - mironline.ru 	Using automation facilities	To the limited liability company "SAS Institute" located at: 21 build.1, Stanislavsky street, 109004 Moscow	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, transfer (provision, access granting), depersonalization, blockage, deletion, annihilation of personal data	5 years
Job applicants	Staff recruitment	<ul style="list-style-type: none"> - Full name - Contacts (phone number, email address) - City of residence - CV 	<ul style="list-style-type: none"> - www.nspk.ru 	Mixed processing (with or without the use of automation facilities)	None	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, depersonalization, blockage, deletion, annihilation of personal data	15 years
Employees	Provision of services for creation and revocation of certificates of digital signature verification keys	<ul style="list-style-type: none"> - Full name - Position - Organization - Contacts (phone number, email address, postal address) 	<ul style="list-style-type: none"> - cryptomir.sbp.nspk.ru - cryptomir.nspk.ru 	Mixed processing (with or without the use of automation facilities)	None	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, depersonalization, blockage, deletion, annihilation of personal data	5 years
Affiliated persons	In order to comply with laws of the Russian Federation	<ul style="list-style-type: none"> - Full name - Residence - Ground(s) for considering the person affiliated - Effective date of ground(s) - Affiliated person's interest in the authorized capital of the joint-stock company, % - Affiliated person's share of common stock of the joint-stock company, % 	<ul style="list-style-type: none"> - www.nspk.ru - www.e-disclosure.ru 	Mixed processing (with or without the use of automation facilities)	None	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, depersonalization, blockage, deletion, annihilation of personal data	In accordance with the law
Representatives of contractors	Provision of information and consulting services through seminars and webinars for partners	<ul style="list-style-type: none"> - Full name - Position - Organization - Contacts (phone number, email address) 	<ul style="list-style-type: none"> - www.nspk.ru 	Mixed processing (with or without the use of automation facilities)	None	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, depersonalization, blockage, deletion, annihilation of personal data	5 years
	Provision of services for creation and revocation of certificates of digital signature verification keys	<ul style="list-style-type: none"> - Full name - Position - Organization - Contacts (phone number, email address, postal address) 	<ul style="list-style-type: none"> - cryptomir.sbp.nspk.ru - cryptomir.nspk.ru 	Mixed processing (with or without the use of automation facilities)	None	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, depersonalization, blockage, deletion, annihilation of personal data	5 years

Personal data subject	Purpose of personal data processing	Scope of personal data	Domain name	Method of personal data processing	Personal data transfer	Personal data processing operations	Term of consent
	Operation under Federal Law No. 161-FZ dated June 27, 2011 "On the National Payment System", the Mir Payment System Regulations and Standards	<ul style="list-style-type: none"> - Full name - Date of birth (day, month, year) - Identity document information (series, number) - INN (Tax identification number) - SNILS (Individual insurance account number) - Position - Organization - Contacts (phone number, email address) 	- www.spp.nspk.ru	Automated processing (using automation facilities)	Data transferred in accordance with provisions of Mir Payment System Regulations and Standards	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, transfer (provision, access granting), depersonalization, blockage, deletion, annihilation of personal data	Determined by provisions of the Mir Payment System Regulations and Standards
	Organizational and legal arrangements for accedence to the Regulations, as well as organizational, operational and technical support to Participants, business partners	<ul style="list-style-type: none"> - Full name - Position - Structural division - Organization - Contacts (phone number, fax number, email address) 	- www.support.nspk.ru	Mixed processing (with or without the use of automation facilities)	Data transferred under the Regulations on NSPK JSC Operational and Payment Clearing Services, the Regulations on NSPK JSC Operational and Payment Clearing Services within the Instant Payment System and the Mir Payment System Regulations	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, transfer (provision, access granting), depersonalization, blockage, deletion, annihilation of personal data	Determined by provisions of the Regulations on NSPK JSC Operational and Payment Clearing Services, the Regulations on NSPK JSC Operational and Payment Clearing Services within the Instant Payment System and the Mir Payment System Regulations
	Development and management of customer programs, including fulfillment of conditions of participation in the Loyalty program, operation under the Loyalty program rules for Mir Cardholders	<ul style="list-style-type: none"> - Full name - Position - Organization - Contacts (phone number, email address) 	- privetmir.ru	Mixed processing (with or without the use of automation facilities)	Data transferred in accordance with provisions of Loyalty program rules for Mir Cardholders	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, transfer (provision, access granting), depersonalization, blockage, deletion, annihilation of personal data	Determined by provisions of the Loyalty program rules for Mir Cardholders
Cardholders	Development and management of customer programs, including fulfillment of conditions of participation in the Loyalty program, operation under the Loyalty program rules for Mir Cardholders	<ul style="list-style-type: none"> - Full name - Sex - Date of birth (day, month, year) - Contacts (phone number, email address) - Residence and registration address - Payment card information (PAN) - Information about Mir purchase transactions 	- privetmir.ru	Mixed processing (with or without the use of automation facilities)	Data transferred in accordance with provisions of Loyalty program rules for Mir Cardholders	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, transfer (provision, access granting), depersonalization, blockage, deletion, annihilation of personal data	Determined by provisions of the Loyalty program rules for Mir Cardholders
	Development and management of customer programs, including the organization of marketing activities and promotions of the Loyalty program, NSPK and Mir Payment System	<ul style="list-style-type: none"> - Full name - Contacts (phone number, email address) - Other information under the Guidelines and conditions of participation in promotions 	- mironline.ru	Mixed processing (with or without the use of automation facilities)	Data is transferred in accordance with the applicable Guidelines and conditions of participation in promotions	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, transfer (provision, access granting), depersonalization, blockage, deletion, annihilation of personal data	Determined by provisions of the Guidelines and conditions of participation in promotions

Personal data subject	Purpose of personal data processing	Scope of personal data	Domain name	Method of personal data processing	Personal data transfer	Personal data processing operations	Term of consent
	Operation under Federal Law No. 161-FZ dated June 27, 2011 "On the National Payment System", the Mir Payment System Regulations and Standards	<ul style="list-style-type: none"> - Primary Account Number - Transaction information - Information about the Cardholder's account involved in a transaction in the store - Warnings about device security breaches - Information on risk management provided by the store - Information about the Cardholder's device - Information about the time zone of the transaction - Shipping address - Other information provided for by the EMV 3DSecure 2.0 specification 	<ul style="list-style-type: none"> - mirconnect.ru - trx.nspk.ru - vsrm.nspk.ru - dispute.nspk.ru - mironline.ru 	Automated processing automation (using facilities)	Data transferred in accordance with provisions of Mir Payment System Regulations and Standards	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, transfer (provision, access granting), depersonalization, blockage, deletion, annihilation of personal data	Determined by provisions of the Mir Payment System Regulations and Standards
	Performance of contracts (agreements) with contractors, implementation of conditions of NSPK JSC service provision for contractors	<ul style="list-style-type: none"> - Full name - Date of birth (day, month, year) - Contacts (phone number) 	<ul style="list-style-type: none"> - score.prod.nspk.ru - score.prod2.nspk.ru 	Automated processing automation (using facilities)	None	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, depersonalization, blockage, deletion, annihilation of personal data	Determined by provisions of the relevant service agreement
IPS Participants' customers	Operation under Federal Law No. 161-FZ dated June 27, 2011 "On the National Payment System", the Regulations on NSPK JSC Operational and Payment Clearing Services within the Instant Payment System	<ul style="list-style-type: none"> - Full name - Personal application - Place of registration - Identity document information (type, series, number) - INN (Tax Identification Number) - Contacts (phone number) - Bank account details (account number) 	<ul style="list-style-type: none"> - sbp-prod1.cbrpay.ru - sbp-prod2.cbrpay.ru - sbp-prod3.cbrpay.ru - sbp-prod4.cbrpay.ru 	Automated processing automation (using facilities)	Data transfer in accordance with provisions of the Regulations on NSPK JSC Operational and Payment Clearing Services within the Instant Payment System	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, transfer (provision, access granting), depersonalization, blockage, deletion, annihilation of personal data	Determined by provisions of the Regulations on NSPK JSC Operational and Payment Clearing Services within the Instant Payment System
Applicants	Processing of applications and feedback handling	<ul style="list-style-type: none"> - First name - Last name - Contacts (phone number, email address, account in social networks) 	<ul style="list-style-type: none"> - www.nspk.ru 	Mixed processing (with or without the use of automation facilities)	None	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, depersonalization, blockage, deletion, annihilation of personal data	5 years
Subscribers	Receiving information about the Loyalty program, promotions, advertisements, and other information, personalization of offers, as well as feedback handling	<ul style="list-style-type: none"> - Contacts (email address) 	<ul style="list-style-type: none"> - privetmir.ru 	Automated processing automation (using facilities)	None	Collection, recording, systematization, accumulation, storage, refinement (updates, alterations), extraction, usage, depersonalization, blockage, deletion, annihilation of personal data	5 years